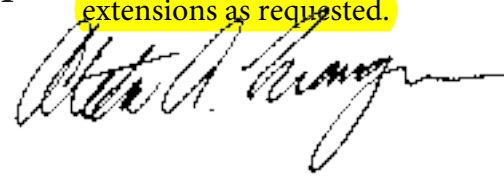


IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Motion GRANTED for
extensions as requested.



INGE GOODSON,

Plaintiff,

v.

PATRICK DONAHOE,

Postmaster General,

Defendant.

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Case No.: 3:13-cv-0487
JUDGE TRAUGER

JOINT MOTION TO CONTINUE DISCOVERY

COMES NOW, the Plaintiff, Inge Goodson, and Defendant, Patrick Donahoe, Postmaster, United States Postal Service, by and through their undersigned counsel, and hereby jointly move to continue the various discovery cut off dates.

The parties have been working together to accomplish discovery in this case. However, various factors have significantly impeded their ability to accomplish all of the discovery that needs to be accomplished. The parties are expecting to exchange written discovery responses within two (2) weeks of the date of this motion. Therefore, the parties are requesting an extension of discovery to allow sufficient time to receive the outstanding responses as well as schedule any deposition. Despite the parties' cooperation and best efforts, a continuance is needed in order to accomplish that. Therefore, the parties ask the Court to amend the Case Management order as follows:

Therefore, the parties wish to extend the deadlines as follows:

- A. Extend discovery deadline from August 8, 2014 to September 17, 2014;
- B. Extend joint mediation report from August 15, 2014 to September 24, 2014;
- C. Extend dispositive motions deadline from September 22, 2014 to November 4,